

MARIA C. RODRIGUEZ (SBN 194201)  
mcrodriguez@mwe.com  
MARJORIE C. SOTO (SBN 313290)  
mcsotogarcia@mwe.com  
MADELINE HASSELL (SBN 347161)  
mhassell@mwe.com  
**McDERMOTT WILL & EMERY LLP**  
2049 Century Park East  
Suite 3200  
Los Angeles, CA 90067-3218  
Telephone: +1 310 788 4126  
Facsimile: +1 310 277 7390

Attorneys for Defendant  
TARGET CORPORATION

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

CATARINA CORTEZ,  
Plaintiff,

v.

TARGET CORPORATION, A  
CALIFORNIA CORPORATION,  
KAMBER TAYLOR, AN INDIVIDUAL,  
and DOES 1 through 50, inclusive;  
Defendants.

CASE NO.

**DECLARATION OF ADAM  
KLARFELD IN SUPPORT OF  
DEFENDANT'S NOTICE OF  
REMOVAL OF CIVIL ACTION TO  
FEDERAL COURT**

Complaint Filed: June 6, 2023

**DECLARATION OF ADAM KLARFELD**

I, Adam Klarfeld, declare as follows:

1. I am Director, Employee Relations Counsel for Target Corporation (“Target”). I have held this position for Target since August 2013. Due to my position, I am knowledgeable of Target’s business operations. I make this declaration in support of Target’s Notice of Removal. In my position, I have access to Target’s California employee data records for certain employees, including personnel records including employment history, which Target makes at or near the time of employment activities referenced, maintains in the normal course of business, and relies upon for a variety of human resources functions. I have personal knowledge of the facts set forth in this declaration, based on my capacity as Director, Employee Relations Counsel, and I could and would competently testify to these facts under oath if called and sworn as a witness.

2. Additionally, in my capacity as Director, Employee Relations Counsel, I have access to and am familiar with documentation related to Target’s state of incorporation and principal place of business.

3. Target is a Minnesota corporation, and its principal place of business is also in Minnesota.

4. By reference to the “principal place of business” in the preceding paragraph, I mean that the majority of Target’s core executive and administrative functions are carried out in Minnesota, and the majority of its executive and administrative offices are located there. For example, Target’s corporate headquarters is located in Minneapolis, Minnesota, where the following corporate activities are performed: communications, public relations, marketing, strategy, diversity, human resources, legal, support management (procurement), and maintenance of corporate records. By “administrative functions,” I mean Target’s finance and accounting functions, high-level human resources functions, and compliance functions, among

1 other administrative functions. Minnesota is also the state in which Target's corporate  
2 income tax return is filed.

3 5. Based on my review of Plaintiff Catarina Cortez's ("Plaintiff") personnel  
4 records, when Plaintiff was employed by Target in California in or about February 10,  
5 2022, she provided Target with a California address as her home address, located in  
6 Delano, California. Plaintiff worked for Target as a Warehouse Worker at Target's  
7 Shafter, California Global Supply Chain Logistics facility. She was terminated on or  
8 about July 10, 2023 for job abandonment.

9 6. At the time of her termination, Plaintiff was a full-time Team Member  
10 who was generally scheduled to work 36 hours per week, with occasional overtime as  
11 needed.


12 7. At the time of her termination on July 10, 2023, Plaintiff's hourly rate of  
13 pay is \$21.86.

14 8. I am informed and believe that Plaintiff was a citizen of California when  
15 she filed this action and remains so as of today.

16 9. I am aware that service of the Complaint on Target was complete on or  
17 about July 3, 2023.

18 I declare under penalty of perjury under the laws of the State of California and  
19 the United States of America that the foregoing is true and correct.

20  
21 Executed on the 31<sup>st</sup> day of July, 2023, in Minneapolis, Minnesota.

22 

23  
24 Adam Klarfeld